

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

In Re:

Chapter 11

DPH Holdings Corp., et al.,

Case No. 05-44481 (RDD)

Reorganized Debtors.

(Jointly Administered)

AFFIDAVIT

RICHARD W. SMITH, Assistant Funds Administrator, Funds Administration,  
P.O. Box 30182, Lansing, Michigan 48909, being first duly sworn says:

1) That I am the Assistant Funds Administrator as authorized in Chapter 5 of  
the Workers' Disability Compensation Act, MCLA 418.515(2), and is duly authorized to  
and does make this affidavit.

2) That pursuant to the Workers' Disability Compensation Act, MCLA  
418.501, MCLA 418.502, MCLA 418.537, MCLA 418.533, and MCLA 418.561, the  
Michigan Self-Insurers' Security Fund has, or may have, limited statutory liability for  
workers' compensation benefits due to disabled employees of the debtor, but subject to  
the subrogation provisions of MCLA 418.533 for any funds paid to said employees.

3) That the attached Summary of Claims represents the reserve estimates for  
Delphi Corporation's workers' compensation claims, as measured on June 9, 2009, for all  
Delphi's post-petition obligations not being assumed by General Motors. This summary  
is based on a Reserve Summary received by the Michigan Workers' Compensation  
Agency from Sedgwick Claims Management, the third-party administrator for Delphi.

The Michigan Self-Insurers' Security Fund claim is supported by reserve values and listed by claimant and facility, as identified in the attachment.

4) Future Incurred But Not Reported claims are estimated at a value of 40% of the Total Known Reserve value, based on history and experience.

Richard W. Smith  
RICHARD W. SMITH

STATE OF MICHIGAN )

ACTING IN THE COUNTY OF LACUM )

Subscribed and sworn before me this 14th day of  
April, 2010

Amy A. Alvera  
Notary Public